

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' UNOPPOSED  
MOTION FOR EXTENSION OF TIME**

Coalition Plaintiffs filed a Motion to Sever, Grant Motion for Attorney's Fees, Grant Motion for Sanctions, and Enter Final Judgment on Severed Claims on October 6, 2021. State Defendants' have until Wednesday, October 20, 2021 to file a response. This response date is in the middle of State Defendants' depositions of other plaintiffs in this case: Jeffrey Schoenberg, Donna Curling, and Donna Price. Further, October 20 is shortly before State Defendants' deadline for completing discovery productions and privilege log.

For the foregoing reasons, State Defendants request an extension of time of 12 days, until November 1, 2021. State Defendants request this extension to help alleviate these significant time constraints. The delay responding to Coalition Plaintiffs' Motion should not prejudice Plaintiffs or

burden the Court in relation to this case. Counsel for State Defendants has conferred with Coalition Plaintiffs' counsel regarding this request, and they do not object to an extension of time for State Defendants to file their response to the Motion no later than November 1, 2021.

A proposed order granting this extension is attached.

Respectfully submitted this 15th day of October 2021.

/s/ Carey A. Miller

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**L.R. 7.1(D) CERTIFICATION**

I certify that this Motion for Extension of Time has been prepared with one of the font and point selections approved by the Court in Local Rule 5.1(C). Specifically, this Motion has been prepared using 13-pt Century Schoolbook font.

/s/ Carey A. Miller  
Carey A. Miller